

a. The proposed project would leverage Viaero's existing cellular network and licensed spectrum to provide exceptional coverage at some of the highest speeds available to consumers through any technology. Unlike fiber, satellite, or WiMax-based systems, however, Viaero's proposed network would be fully mobile and rely upon fully-licensed spectrum. Moreover, Viaero's current market strength as a cellular provider and as a provider of EDGE network data services within much of the Proposed Funded Service Area ("PFSA") will allow the company to leverage existing network operations, sales, and marketing capabilities to provide a compelling, sustainable, cost-effective, realistic, and shovel-ready system.

b. Viaero's PFSA covers 545 communities in rural eastern Colorado, south central Colorado, and rural Nebraska. [REDACTED]

[REDACTED] The PFSA comprises a substantial portion of Viaero's current cellular coverage area, which is focused entirely on small cities (Fort Collins, CO being the largest at roughly 118,000 people) and rural areas.

c. Viaero's PFSA encompasses 492,290 households and 107,951 businesses.

d. Viaero's PFSA covers 9,365 community anchor institutions, public safety entities, and critical community organizations.

e. Viaero will offer a mobile wireless broadband product with initial download speeds of 21 Mbps, scalable to speeds exceeding 155 Mbps and beyond. With an extremely low cost of deployment per household and the advantage of complete mobility, Viaero's pricing and services will attract a wide range of fixed and mobile users: rural American households, lower income populations, public safety, local governments, farms and other rural businesses, schools, and healthcare institutions, just to name a few. Viaero's solution offers these individuals and institutions reliable, high-speed connections with scarcely more cost or hassle than a wireless telephone, making their use of broadband connections affordable and sustainable. Perhaps most important of all, however, is the mobility possible with HSPA. With mobile broadband, police and fire departments can transmit data in real time. Ambulances can receive medical records and transmit vital signs during lengthy patient transports in rural areas. Schools can expand their course offerings through distance learning and teacher-sharing arrangements. In addition to standard HSPA offerings, Viaero also expects to provide dedicated middle mile microwave paths for school systems, public safety, and hospitals requiring higher bandwidth.

f. Viaero is committed to building an open, non-discriminatory network. In addition to complying with the FCC's Internet Policy Statement in all respects, Viaero's guiding network principle will be to provide each subscriber with unfettered access to the legal internet content of their choice. Under no circumstances will Viaero favor traffic from any specific content provider. To the extent possible, Viaero will prioritize connections for public safety. Viaero will prominently display its non-discriminatory network management policies on its website, and will

offer interconnection, data roaming, and wholesale access to its network on just, reasonable and non-discriminatory terms and conditions.

g. Viaero proposes to “overlay” its existing GSM infrastructure to offer a mobile wireless broadband product using High Speed Packet Access (HSPA) technology. The use of HSPA in the Proposed Funded Service Area is ideal for several reasons. The technology has been proven through real world deployments, as well as through rigorous testing and trials conducted by Viaero prior to this Application. The topography, low population density, and Viaero’s existing spectrum licenses and towers (including one of the country’s most extensive microwave backhaul networks) make Viaero’s HSPA solution all the more compelling. Viaero is confident, based on its experience with HSPA, that it can offer consumers and businesses download speeds of 21 Mbps today.

h. Viaero has operated a growing, profitable cellular and wireless data business since 1991. The company’s management has extensive experience operating wireless voice and data networks, and has a proven track record of success within the PFSA. For the past five years, Viaero has experienced 40 percent average annual revenue growth and 30 percent average annual subscriber growth. As a result, Viaero has [REDACTED] subscribers. Whereas most large carriers base their rural business plans—if they have rural business plans—on highway roaming, Viaero’s coverage demonstrates a long-standing focus on rural consumers and businesses. Viaero’s coverage extends far into the most remote and sparsely populated areas of Colorado and Nebraska. Also, the company has a long history of working with rural communities in its PFSA, building retail outlets and towers designed to serve small towns, as well as working with hospitals, public safety and local government.

Viaero employs approximately 325 rural citizens of Colorado and Nebraska, and those employees run all aspects of Viaero’s existing business. Viaero does not outsource business operations, customer care, or other primary business functions. A broadband network built under this Application will be no different. Viaero’s existing network, customer care, sales and marketing capabilities, and brand recognition will contribute greatly to the sustainability of its proposed broadband offerings. In addition to housing a successful operation, Viaero’s headquarters in Fort Morgan has established processes for compliance with complex state and federal regulations governing the provision of telecommunications, most notably the Universal Service Fund, which demonstrates the company’s ability to provide complete and transparent compliance with all conditions of loans and grants that have been, or will be, established by RUS or NTIA.

i. The overall infrastructure cost of the project is \$154,037,515, or \$312.89 per household within the PFSA. These figures are based upon firm price quotations from key vendors and substantial experience with constructing the type of infrastructure needed to complete this project.

j. Viaero expects to add an average of [REDACTED] subscribers by 2014.

k. Viaero expects to create 201 additional jobs *within its organization* as a result of this project. Viaero bases this highly conservative estimate on its financial model associated with this project and extensive operational experience. To estimate how expanded broadband availability would impact the PFSA, however, we rely upon a Brookings Institution study published in 2007, statistics gathered by the Nebraska and the Colorado Departments of Labor, and the FCC Report on High-Speed Services for Internet Access published in July of 2009. Based upon the aforementioned data sources, Viaero estimates that this project will yield between 4,009 and 6,001 jobs in the PFSA within the first two years of funding, and between 12,054 and 18,066 jobs within five years. We derive this estimate based upon four data points: (1) according to the Brookings Institution, “for every one percentage point increase in broadband penetration in a state, employment is projected to increase by 0.2 to 0.3 percent per year;” (2) average annual growth in broadband penetration within Colorado and Nebraska has ranged between 22 and 23 percent for the last five years; (3) penetration growth rates in Colorado and Nebraska have declined year-over-year at an average rate of about 25 percent for the last five years; and (4) Viaero will enjoy an incremental penetration rate of 6.5 percent per year over five years within the PFSA.